

In re:  
Erie Kash Out Properties LLC  
Debtor

Case No. 25-11729-amc  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0313-2  
Date Rcvd: Jul 07, 2025

User: admin  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 09, 2025:

Recip ID	Recipient Name and Address
db	+ Erie Kash Out Properties LLC, 255 West Fisher Avenue, Philadelphia, PA 19120-3244

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 09, 2025

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 3, 2025 at the address(es) listed below:

Name	Email Address
ANTHONY ST. JOSEPH	on behalf of Creditor United States of America on behalf of Small Business Administration (SBA) anthony.stjoseph@usdoj.gov Mardella.Suarez@usdoj.gov;CaseView.ECF@usdoj.gov
BRAD J. SADEK	on behalf of Debtor Erie Kash Out Properties LLC brad@sadeklaw.com bradsadek@gmail.com;sadek.bradj.r101013@notify.bestcase.com;documents@sadeklaw.com
BRIAN CRAIG NICHOLAS	on behalf of Creditor U.S. Bank Trust National Association not in its individual capacity but solely as Trustee of Fidelity & Guaranty Life Mortgage Trust 2018-1 brian+ecf@briannicholas.com, mccallaecf@ecf.courtdrive.com
HOLLY SMITH MILLER, ESQ.	hsmiller@gsbblaw.com chsm11@trustesolutions.net
JOHN HENRY SCHANNE	on behalf of U.S. Trustee United States Trustee John.Schanne@usdoj.gov

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MICHAEL I. ASSAD

on behalf of Debtor Erie Kash Out Properties LLC michael@sadeklaw.com sadeklaw@recap.email

PAMELA ELCHERT THURMOND

on behalf of Creditor CITY OF PHILADELPHIA pamela.thurmond@phila.gov

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 8

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Erie Kash Out Properties LLC,

*Debtor.*

Case No. 25-11729-amc  
Chapter 11

**Consent Order Authorizing Use of Cash Collateral**

**AND NOW**, upon consideration of the Motion for Interim Order Authorizing Use of Cash Collateral filed by Debtor Erie Kash Out Properties LLC, after notice and hearing, and with the consent of the Debtor, U.S. Bank Trust N.A., and the U.S. Small Business Administration, it is hereby **ORDERED** that:

1. The Motion is **GRANTED**.
2. The Debtor is authorized to use cash collateral in accordance with the monthly budget attached as Exhibit A.
3. As adequate protection to U.S. Bank Trust N.A., the Debtor must make monthly mortgage payments as required under the loan documents, beginning with the payment due on May 8, 2025, plus an additional \$250.00 per month, due with each mortgage payment.
4. As adequate protection to the U.S. Small Business Administration, the Debtor must make monthly payments in the amount of \$529.00, payable on the first day of each month for which the use of cash collateral is authorized, beginning on June 1, 2025.
5. The Debtor must make all payments that became due in May and June 2025 within seven (7) days after the entry of this order.
6. If the Debtor fails to make any payment required under this order within five days after it becomes due, any affected creditor may serve a written notice of default on the Debtor by first class mail, postage prepaid, at its address on the clerk's service list, and file a copy of the notice on the court docket. The notice must state the nature of the default and the action required to cure it. If the default is not cured within fifteen days of docketing the notice, the creditor may file a certification of default.
7. Upon certification of default, the court will, without further notice or hearing, enter an order terminating the Debtor's authority to use cash collateral and modifying the automatic stay to permit the creditor to exercise its *in rem* rights and remedies under applicable nonbankruptcy law with respect to all property securing the creditor's claim.

Date: July 3, 2025



Ashely M. Chan  
Chief U.S. Bankruptcy Judge

We consent to the form and entry of this order.

SADEK LAW OFFICES LLC  
*Attorney for Debtor*

/s/ Michael I. Assad  
By: Michael I. Assad

MCCALLA RAYMER LEIBERT PIERCE, LLP  
*Attorney for U.S. Bank Trust N.A.*

/s/ Brian Nicholas  
By: Brian Nicholas

DAVID METCALF  
UNITED STATES ATTORNEY  
*Attorney for U.S. Small Business Administration*

/s/ Anthony St. Joseph  
By: Anthony St. Joseph

**Exhibit A**

	June-25	July-25	August-25	September-25	October-25
<b>Balance Forward</b>	\$0.00	\$197.81	\$1,338.43	\$2,479.05	\$3,619.67
Rents Received	\$6,000.00	\$6,000.00	\$6,000.00	\$6,000.00	\$6,000.00
US Bank (Contractual)	(\$3,985.62)	(\$1,992.81)	(\$1,992.81)	(\$1,992.81)	(\$1,992.81)
US Bank (Adequate Protection)	(\$500.00)	(\$250.00)	(\$250.00)	(\$250.00)	(\$250.00)
Insurance Premium	(\$188.57)	(\$188.57)	(\$188.57)	(\$188.57)	(\$188.57)
SBA Payment	(\$529.00)	(\$529.00)	(\$529.00)	(\$529.00)	(\$529.00)
Property Taxes	(\$199.00)	(\$199.00)	(\$199.00)	(\$199.00)	(\$199.00)
Property Maintenance and Repairs	\$0.00	(\$800.00)	(\$800.00)	(\$800.00)	(\$800.00)
Attorney Fees	\$0.00	(\$500.00)	(\$500.00)	(\$500.00)	(\$500.00)
Subchapter V Trustee	(\$400.00)	(\$400.00)	(\$400.00)	(\$400.00)	(\$400.00)
<b>Ending Balance</b>	\$197.81	\$1,338.43	\$2,479.05	\$3,619.67	\$4,760.29

	November-25	December-25	January-26	February-26	March-26
<b>Balance Forward</b>	\$4,760.29	\$5,900.91	\$7,041.53	\$8,182.15	\$9,322.77
Rents Received	\$6,000.00	\$6,000.00	\$6,000.00	\$6,000.00	\$6,000.00
US Bank (Contractual)	(\$1,992.81)	(\$1,992.81)	(\$1,992.81)	(\$1,992.81)	(\$1,992.81)
US Bank (Adequate Protection)	(\$250.00)	(\$250.00)	(\$250.00)	(\$250.00)	(\$250.00)
Insurance Premium	(\$188.57)	(\$188.57)	(\$188.57)	(\$188.57)	(\$188.57)
SBA Payment	(\$529.00)	(\$529.00)	(\$529.00)	(\$529.00)	(\$529.00)
Property Taxes	(\$199.00)	(\$199.00)	(\$199.00)	(\$199.00)	(\$199.00)
Property Maintenance and Repairs	(\$800.00)	(\$800.00)	(\$800.00)	(\$800.00)	(\$800.00)
Attorney Fees	(\$500.00)	(\$500.00)	(\$500.00)	(\$500.00)	(\$500.00)
Subchapter V Trustee	(\$400.00)	(\$400.00)	(\$400.00)	(\$400.00)	(\$400.00)
<b>Ending Balance</b>	\$5,900.91	\$7,041.53	\$8,182.15	\$9,322.77	\$10,463.39

	April-26	May-26
<b>Balance Forward</b>	\$10,463.39	\$11,604.01
Rents Received	\$6,000.00	\$6,000.00
US Bank (Contractual)	(\$1,992.81)	(\$1,992.81)
US Bank (Adequate Protection)	(\$250.00)	(\$250.00)
Insurance Premium	(\$188.57)	(\$188.57)
SBA Payment	(\$529.00)	(\$529.00)
Property Taxes	(\$199.00)	(\$199.00)
Property Maintenance and Repairs	(\$800.00)	(\$800.00)
Attorney Fees	(\$500.00)	(\$500.00)
Subchapter V Trustee	(\$400.00)	(\$400.00)
<b>Ending Balance</b>	\$11,604.01	\$12,744.63